

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

THE TRAVELERS INDEMNITY  
COMPANY,

Plaintiff,

V.

CST INDUSTRIES, INC.,

Defendant.

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CASE NO. 2:06-cv-924-MEF

## REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Federal Rule of Civil Procedure 26(f), a meeting was held on November 2, 2006, via conference call and was attended by:

Linda Hinson Ambrose, Esq., attorney for Plaintiff, The Travelers Indemnity Company

Bert P. Taylor, Esq., attorney for Defendant, CST industries, Inc.

**2. Pre-discovery Disclosures.** The parties stipulate that they will exchange within 21 days from the date of the issuance by this Court of the Uniform Scheduling Order in this case the information required by Federal Rule of Civil Procedure 26(a)(1).

**3. Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects: Plaintiff's claims and damages and Defendant's defenses.

All discovery commenced in time to be completed by September 1, 2007.

Maximum of 40 interrogatories by each party to any other party. Responses are due within 30 days after service.

Maximum of 25 requests for admission by each party to any other party. Responses are due within 30 days after service.

Maximum of 10 depositions by plaintiff and 10 by defendant.

Each deposition, other than experts, is limited to a maximum of 4 hours unless extended by agreement of the parties.

Reports from retained experts under Rule 26(a)(2) are due from the plaintiff by March 30, 2007 and from the defendant by June 1, 2007.

Supplementations under Rule 26(e) are due by August 17, 2007.

#### **4. Other Items.**

The Parties do not request a conference with the Court before entry of the scheduling order.

The parties request a pretrial conference 4 to 6 weeks before the trial of this matter.

Plaintiff should be allowed until January 31, 2007, to join additional parties and until January 31, 2007 to amend the pleadings.

Defendant should be allowed until February 28, 2007, to join additional parties and until February 28, 2007, to amend the pleadings.

All potentially dispositive motions should be filed 90 days prior to the pretrial conference.

Settlement cannot be evaluated prior to the completion of discovery.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from the plaintiff 30 days before the pretrial conference and from the defendant 30 days before the pretrial conference.

The parties should have 15 days after service of the final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by February, 2008, and at this time is expected to take approximately 3 days.

Date:\_\_\_\_\_

/s/ Linda Hinson Ambrose, Esq.  
ASB 1753-B38L  
ATTORNEY FOR PLAINTIFF  
The Travelers Indemnity Company

OF COUNSEL:

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/s/ Bert P. Taylor, Esq.  
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